

PPR Supporting Statement

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification. Requests for approval shall:

1. Explain the circumstances that make the collection of information necessary.

The Standard Form - Performance Progress Report (SF-PPR) was developed to serve as a government-wide standard for recipients of Federal funds to report on their performance under Federal grants and cooperative agreements. There are several factors which led to the development of this standard.

First, performance reporting is an integral part of the President's Management Agenda (PMA). Second, the requirement for grantees to report on performance is OMB grants policy. Specific citations are contained in: (1) OMB Circular A-102, Grants and Cooperative Agreements with State and Local Governments, also known as the "Common Rule" [codified at 45 CFR Part 92] and (2) OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations [codified at 2 CFR Part 215]. Attachment 1 contains the grantee performance reporting requirements as excerpts from these OMB grant policies.

Furthermore, under Public Law 106-107, the Federal Financial Assistance Management Improvement Act of 1999 (PL106-107), the Federal agencies and the Office of Management and Budget are required to streamline and simplify reporting

procedures. Attachment 2 contains the text of the relevant portions of this statute at 31 USC 6101 [note Sections 5(a)(1), 5(a)(3), 5(a)(5), 5(a)(6), 6(a)(1)(B), and 6(a)(2)(B)]. Under the CFO Council's Grants Policy Committee (GPC), a Post Award Work Group is tasked with developing the government-wide standards to streamline reporting and thereby meet the statutory requirements. The SF-PPR was developed by this Post Award Work Group after considerable effort to reach consensus among 26 grant-making agencies whose multiple programs needed to be considered to arrive at a government-wide performance reporting standard for grants and cooperative agreements.

Also relevant are the two General Accounting Office (GAO) reports that evaluated the progress in meeting the requirements of PL 106-107. GAO-05-355, Grants Management: Additional Actions Needed to Streamline and Simplify Processes, was published in April 2005; GAO-06-566, Grantees' Concerns with Efforts to Streamline and Simplify Processes, was published in July 2006. Both reports noted that "efforts toward common grant-reporting systems are moving slowly" and that grantees are concerned that progress has been inadequate. The SF-PPR will alleviate these concerns and will serve as a standard to simplify grantee performance reporting.

Finally, the Grants Management Line of Business (GMLoB) is an E-Gov initiative under the PMA whose purpose is to provide end-to-end grants management (that is, over the entire life cycle of a grant from announce-mint to closeout) under a consortia-based approach to consolidate grant systems across agencies by identifying and selecting agencies and their systems that can serve as shared service providers or centers of excellence to be used by other agencies. In February 2006, OMB named the Administration for Children and Families (ACF) within the Department of Health and Human Services (HHS) as one of three GMLoB consortia providers. The ACF Grants Center of Excellence (CoE) provides grants management system services to six operating divisions within HHS and three grant-making agencies external to HHS. In order to move forward with streamlined grantee performance reporting, the HHS/ACF CoE is sponsoring the SF-PPR.

The following agencies have expressed interest in using the SF-PPR and will most likely adopt it:

- 0 Administration on Aging (AoA)
- 0 Centers for Medicare & Medicaid Series (CMS)
- 0 Indian Health Service (HIS)
- 0 Offices of Public Health and Science (OPHS)
- 0 Health Resources and Services Administration (HRSA)
- 0 Denali Commission
- 0 Social Security Administration (SSA)
- 0 Food Safety and Inspection Service (FSIS)
- 0 Community Development Financial Institutions Fund (CDFI)
- 0 Department of Veterans Affairs (VA)

2. Purpose and Use of the Information Collection

As a new collection, the SF-PPR is a set of uniform reporting formats that will be used by grantees to meet the performance requirements contained in the terms and conditions of their Federal awards. The SF- PPR consists of a cover page (which matches the SF-424 grant application cover page), an optional cover page continuation sheet (SF-PPR-2) and six optional formats to report on program-specific performance. As a defined set of standard formats, the SF-PPR facilitates the collection of congressionally mandated and needed program-specific and agency-specific information by allowing the information to be collected uniformly.

Federal program managers may opt to only require their respondents to submit the cover with a simple narrative, if that suffices. Alternatively, programs may opt to require the cover page, the continuation page, and one or more of the six optional formats. These optional formats include: SF-PPR-A, Performance Measures; SF-PPR-B, Program Indicators; SF-PPR-C, Benchmark Evaluations; SF-PPR-D, Table of Activity Results; SF-PPR-E, Activity-Based Expenditures; and SF-PPR-F, Program/Project Management.

3. Use of Improved Information Technology and Burden Reduction

The SF-PPR uniform reporting formats will support systematic electronic data collection, making it easier for both grantee and grantor communities to provide electronic options. Common elements across forms and programs will

improve performance reporting by providing grantees with a single face across programs and agencies.

Electronic performance reporting will support the "pre-population" of forms with data from back-office systems, including program, grantee, and project-specific information, and will facilitate data validation against a database to further improve the accuracy of performance reporting. As a set of performance reporting standards, the SF-PPR will provide better opportunities for third-party vendors to build electronic solutions. While implementation of the SF-PPR is anticipated to primarily involve electronic submissions, agencies may accept paper SF-PPR reporting as well.

4. Efforts to Identify Duplication and Use of Similar Information

The SF-PPR will provide uniformity in the collection of performance information and should result in fewer unique collection instruments. OMB has cleared hundreds of grant-related performance reporting forms to date, which has resulted in considerable reporting burden on the grantee, particularly when the grantee receives funding from more than one Federal program. Once the SF-PPR is established as a standard, agencies will be encouraged to adopt its use for meeting performance reporting requirements and will phase out use of unique reporting forms. This will result in considerably less complex reporting burden on the grantee.

5. Impact on Small Businesses or Other Small Entities

Regarding any impact on small businesses, the SF-PPR formats include a short version (SF-PPR-B), a medium version (SF-PPR-A), and a longer version (SF-PPR-C). The SF-PPR also provides agencies with the option to require only the SF-PPR cover page which includes a short narrative.

6. Consequences of Collecting the Information Less Frequently

The consequences of grantees not reporting on performance range from an agency withholding future funds for the project to an agency making additional terms and conditions on the award. Attachment 1 contains the excerpts from OMB grant policies that state requirements for performance

reporting. These requirements are part of the award terms and conditions.

7. Special Circumstances relating to the Guidelines of 5 CFR 1320.5

The SF-PPR does not require special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The 60-day Federal Register notice was published on Thursday, April 5, 2007 [72 FR 16796]. The 30-day Federal Register notice was published on Tuesday, July 24, 2007 [72 FR 40307].

In addition to these opportunities for the public to review and comment on the SF-PPR, several other methods have been used to solicit comments from the grants community - both grantee and grantor. On March 8, 2007, the Grants Policy Committee (GPC) of the U. S. Chief Financial Officer's Council conducted a Webcast, broadcast from the U. S. Department of Agriculture (USDA). This Webcast was publicized via Federal Register notice on Wednesday, February 14, 2007 [72 FR 7090]. The Webcast served as an opportunity for the public to view and discuss six proposed government-wide post-award reporting forms, including the SF-PPR. Prior to the actual Webcast, the proposed forms were posted on the Federal Grants Streamlining Initiative website at http://www.grants.gov/aboutgrants/grants_news.jsp.

Comments were received from three entities: the HHS Administration for Children and Families (ACF), the HHS Health Resources and Services Administration (HRSA), and the HHS Substance Abuse and Mental Health Services Administration (SAMHSA). No comments were received from the public. ACF had one comment; HRSA had twenty-eight (28) different comments; and SAMHSA had six comments for a total of thirty-five (35) comments from the three entities. Attachment 3 contains the comments and the resolution of each comment.

9. Explanation of Any Payment or Gift to Respondents .

The SF-PPR does not involve a payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

When the SF-PPR data collection is done electronically, data submissions will be to a secure system environment. Respondents will be required to be authenticated, via ID and password. ACF will use the On-Line Data Collection (OLDC) system to pilot test the SF-PPR. [Note that agencies may accept paper SF-PPR reporting.]

11. Justification for Sensitive Questions

The SF-PPR currently does not include questions of a sensitive nature. Any agency that may desire inclusion of such questions in that agency's use of the SF-PPR will require a separate request to OMB.

12. Estimates of Annualized Burden Hours and Costs

Burden hour charts

Administration for Children and Families (ACF)

I. Estimates are based on experience with ACF programs (does not include identification of specific information collections):

	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Burden per Response
Performance Progress Report (SF-PPR)	7686	1	0.416667	3202.50
Cover Page Continuation (SF-PPR-2)	6540	1	0.333333	2180.00
Performance Measures (SF-PPR-A)	755	1	0.75	566.25
Program Indicators (SF-PPR-B)	3075	1	0.166667	512.50
Benchmark Evaluations (SF-PPR-C)	249	1	1.5	373.50
Table of Activity Results (SF-PPR-D)	3019	1	0.75	2264.25

Activity Based Expenditures (SF-PPR-E)	2779	1	0.333333	926.33
Program/Project Management (SF-PPR-F)	37	1	0.5	18.50

ACF Estimated Total Annual Burden Hours: 10043.83

II. Estimates based on specific information collections that would be suitable for conversion to the SF-PPR:

OMB Control Number	Title	Burden Hours
0970-0177	Office of Child Support Enforcement Performance Report	253
0980-0172	DDC Performance Report	253
0980-0160	PADD Performance Report	267
0970-0121	Low-Income Heat and Energy Assistance Program	329
0970-0271	FYSB PPF Abstinence Education Program	239
0970-0320	OCSE-75 Tribal Annual Report	47

	Total for Specific Information Collections	1,388

ACF Total Annual Estimated Hours for Specific and non-Specific Information Collections

11,432

ALL AGENCIES GRAND TOTAL ANNUAL BURDEN HOURS: 16927.33

On average, the hourly cost equivalent of the PPR burden is \$60.00 per hour, for a total cost equivalent of \$1,015,639.80 across all agencies.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Current reporting requirements are contained in the grant award terms and conditions. The SF-PPR does not require additional recordkeeping by the respondents. Use of the SF-PPR is expected to reduce grantee reporting burden by way of several improvements: reporting via the SF-PPR will be exclusively electronic; much of the data on the SF-PPR will be "pre-populated" for the respondent, based on their user ID and specific grant award identifier; and providing a government-wide standard for any performance reporting will relieve the respondent from having to retain information in multiple different formats.

14. Annualized Cost to the Federal Government

The SF-PPR formats will be provided via an existing system - the On-Line Data Collection (OLDC) system, which has already been developed. Adding the SF-PPR cover page and six optional formats to OLDC will involve minimal start-up costs (under \$500.00) and no additional annual operating costs to the Federal government.

15. Explanation for Program changes or Adjustments

New collection.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

No plan to publish results of the SF-PPR collections.

17. Reason(s) for Display of OMB Expiration Date is Inappropriate

N/A (not seeking approval to not display the expiration date for OMB approval of the information collection)

18. Exceptions to Certification for Paperwork Reduction Act Submissions

N/A (no exception to the certification statement)